



STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION

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September 28, 2004

Mr. Orlando Monaco
Department of Navy
Engineering Field Activity-Northeast
Code 1823/OM
10 Industrial Highway, Mailstop 82
Lester, PA 19113-2090

Re: Building 95, Monitoring Event 19-April 2004
Naval Air Station, Brunswick, Maine

Dear Mr. Monaco:

The Maine Department of Environmental Protection (MEDEP) has reviewed the Draft Final Monitoring Event 19 Report-April 2004 for Building 95, dated August 2004, prepared by Environmental Chemical Corporation. Based on that review MEDEP has the following comments and issues.

General Comments:

1. With only several exceptions, this report reads well and contains the appropriate detail and discussion of findings. (NR)
2. The introduction and project background sections do not mention or give any information concerning the soil removal action that occurred as part of the remedy in 1995. Figure 2 delineates the areas and depths of soil excavated, but this figure is not referenced with regards to site history. A paragraph needs to be added that briefly summarizes the soil removal action and pre-removal groundwater contamination and reference Figure 2 in the added summary. (ED)
3. In the future please include a report label insert in the binder edge for all reports placed in hard cover ring binders. (NR)

Specific Comments:

4. Section 1.4, Measurement of Water Level Elevations, p. 1-3, 1st paragraph:

Previously, a minimum of eight monitoring wells were measured. The missing wells this event are MW-NASB-209R and MW-NASB-210, located several hundred feet south and west of the site, respectively. These wells were used to help directionally orient the groundwater elevation contours with reference to an area larger than the small Building 95 parcel. MEDEP believes that these wells provide important control, and must to be included as part of the Long Term Monitoring program. (RR)

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5. Section 1.5, Groundwater Monitoring, Sampling, and Analysis, p. 1-4, 4th paragraph:

"The Field Record of Well Purging, and Sampling forms completed during both sampling events are provided in Appendix E.2."

The inference of two sampling events is confusing, when the data all are dated April 6, 2004. Please edit. (ED)

6. Section 3.1, Long-Term Monitoring Objectives, p. 3-1, 1st bullet:

"Neither compound exceeded the State MEGs (0.3 µg/L for technical chloridane and 0.04 µg/l for heptachlor epoxide) for the April 2004 monitoring event."

Please change "0.3" to "0.27" µg/L, and "technical" to "*alpha-chloridane*". (ED)

7. Table 3, Summary of Water Quality Indicator Parameters:

Dissolved oxygen level in MW-NASB-098 is reported as 10.01 mg/L. The prior three sampling events measured levels between 0.38 and 0.99 mg/L. It does not seem likely that groundwater could change from nearly oxygen absent to close to oxygen saturated between events. Considering all three wells being sampled over the prior three events, the highest reading was reported as 3.4 mg/L. Besides the MW-NASB-098 anomaly, the dissolved oxygen in MW-NASB-097 was double the values for the previous three events. Only MW-NASB-067 was close to a prior reading (2.47 versus 2.06 mg/L). Since MW-NASB-067 was the first well sampled for Event 19 on April 6, it appears that the dissolved oxygen instrument lost its calibration prior to sampling the other two wells.

Please review these data and talk with the field person to decide if the two high readings should be flagged as possible meter malfunction. Also field personnel should be trained to recognize when readings like these seem anomalous. (RR)

8. Appendix B, Summary of Groundwater Samples Collected from Building 95 on 6 April 2004:

a.) This table would be best placed in the "Tables" section of the report (i.e., Table 4), and not in an appendix. (ED)

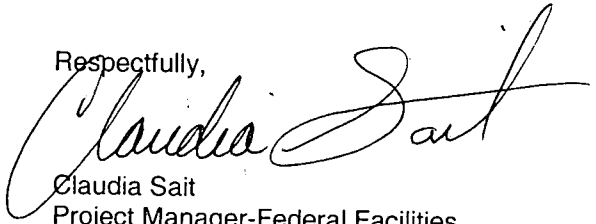
b.) Also, please re-title the table "*Summary of Groundwater Analytical Results - Pesticides, Building 95 - 6 April 2004*". (ED)

Each comment is followed with a code that indicates whether a response is required (RR), no response is required (NR), editorial correction needed (ED); or meeting discussion requested (MTG). No response is required for editorial corrections unless the Navy disagrees with the correction.

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Thank you for the opportunity to review this report. If you have any questions or comments please call me at (207) 287-7713 or email me at claudia.b.sait@maine.gov.

Respectfully,

A handwritten signature in black ink, appearing to read 'Claudia Sait', written over the word 'Respectfully,'.

Claudia Sait
Project Manager-Federal Facilities
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Cf: File
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